

October 12, 2018

**BY ELECTRONIC FILING**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: NOTICE OF EX PARTE**  
**GN Docket No. 17-258: *Promoting Investment in the 3550-3700 MHz Band***

Dear Ms. Dortch:

East Kentucky Network, LLC d/b/a Appalachian Wireless (“EKN”) notes that, at the Federal Communications Commission’s (the “Commission”) Open Meeting scheduled for October 23, 2018, the Commission will consider a draft Report and Order in the above-referenced proceeding, which relates to Priority Access Licenses (“PALs”) for the Citizens Broadband Radio Service (“CBRS”) in the 3.5 GHz Band.

Of particular importance to EKN, the draft Report and Order includes a rule change that would increase the size of PAL license areas from census tracts to counties. This proposed rule change (1) will allow for a more efficient auction process, (2) will enable rural, wireless carriers such as EKN to better serve their customers, (3) will help promote competition, and (4) will support network continuity concerns, all of which will ultimately benefit rural communities and customers, including those in EKN’s service area.

EKN would like to voice its great appreciation for the Commission’s thorough analysis of this issue and respectfully urges the Commission to adopt this rule change at its upcoming Open Meeting.

This letter is being filed electronically pursuant to Section 1.1206 of the Commission’s rules.

Respectfully submitted,



W.A. Gillum  
CEO/General Manager on behalf of  
East Kentucky Network, LLC d/b/a Appalachian Wireless